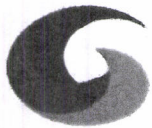


REDACTED - FOR PUBLIC INSPECTION



ASL SERVICES HOLDINGS, LLC.

GLOBAL VRS
3700 COMMERCE BOULEVARD
KISSIMMEE, FLORIDA 34741

Via Overnight Delivery and Electronic Comment Filing Submission (ECFS)

Received & Inspected

February 17, 2017

FEB 21 2017

FCC Mailroom

Ms. Marlene H. Dortch, Secretary
Federal Communications
Commission 445 12th Street, S.W.
Washington, D.C. 20554

RE: ASL Services Holdings, LLC dba GlobalVRS Submission in Support of *Video Relay Service (VRS) Rate Proposal*, CG Docket No. 10-51; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

DOCKET FILE COPY ORIGINAL

Dear Secretary Dortch:

ASL Services Holdings, LLC dba GlobalVRS ("Global VRS") submits the attached financial statement in support of the non-dominant providers¹ January 31, 2017 *Video Relay Service (VRS) Rate Proposal*, in the above-referenced proceeding.

GlobalVRS' submission demonstrates that the Company's financial condition has worsened and remains dire despite adoption of the Commission's March 2016 temporary rate freeze.²

Request for Highly Confidential Treatment. Pursuant to Section 0.459 of the Commission's rules,³ "Exemption 4" of the Freedom of Information Act,⁴ and the Commission's *Second Protective Order* in the instant proceeding,⁵ GlobalVRS respectfully requests that entirety of its submission be designated as "Highly Confidential" and subject to the strict protections accorded under the *Second Protective Order*.

GlobalVRS' financial statement constitutes a "trade secret" as set forth in Section 0.457 of the Commission's rules,⁶ in that the information reveals specific strategic actions taken by the Company that would be useful to competitors. Further, the Company's financial statement

¹ Purple Communications, Inc., Convo Communications, LLC, CSDVRS, LLC dba ZVRS, and GlobalVRS.

² See *Structure and Practices of the Video Relay Service Program* et al., CG Docket Nos. 10-51 & 03-123, Report and Order, FCC 16-25 (Mar. 3, 2016).

³ 47 C.F.R. §0.459.

⁴ 47 C.F.R. §0.457(d). See *National Parks and Conservation Assn. v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974) ("National Parks"); Southern Company Request for Waiver of Section 90.629 of the Commission's Rules, 14 FCC Rcd. 1851, 1860 (1998).

⁵ See *Structure and Practices of the Video Relay Service Program* et al., CG Docket Nos. 10-51 & 03-123, Second Protective Order, DA 12-858 (May 31, 2012) [Second Protective Order].

⁶ 47 C.F.R. §0.457.

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contains highly confidential information not intended for public consumption. GlobalVRS would not otherwise make this information publically available under any circumstance. Release of this information the public could cause GlobalVRS irreparable and inestimable harm. GlobalVRS requests that the redacted sections be withheld from public inspection, accordingly. Should disclosure of the redacted sections be requested, GlobalVRS requests that it be informed of such request so that it may take appropriate action to safeguard its interests.

In support of its request and pursuant to Section 0.459(b) of the Commission's rules, GlobalVRS states as follows:

1. Identification of the specific information for which confidential treatment is sought.

GlobalVRS requests "Highly Confidential" designation for the entire financial statement.

2. Identification of the circumstances giving rise to the submission.

GlobalVRS is providing confidential financial information to demonstrate the need for the *Video Relay Service (VRS) Rate Proposal*.

3. Explanation of the degree to which the information is commercial or financial or contains trade secret or is privileged.

The confidential information constitutes detailed confidential information revealing the GlobalVRS operations that could be useful to competing providers. This information is safeguarded from competitors and is not made to the public accordingly.

4. Explanation of the degree to which the information concerns a service that is subject to competition

The Highly Confidential information involves video relay services, a highly competitive service now dominated by two providers.

5. Explanation of how disclosure of the information could result in competitive harm.

Disclosure of confidential information could cause substantial competitive harm to GlobalVRS, because other video relay service providers would gain access to critical operations information and be able to assess the Company's relative size; information that would be useful in competing against GlobalVRS and undermine the Company's ability to compete.

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6. Identification of any measures taken to prevent unauthorized disclosure.

GlobalVRS treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to competitors, the public, or third parties.

7. Identification of whether the information is available to the public and the extent to of any previous disclosures of information to third parties.

GlobalVRS does not make the redacted information to the public or to third parties. The highly confidential has been provided to the Commission.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

This information is being submitted by GlobalVRS. GlobalVRS requests that the redacted information be treated as highly confidential indefinitely as the Company cannot identify a date certain by which this information could be disclosed without causing irreparable competitive harm to Global VRS.

GlobalVRS hereby places other parties on notice that it will vigorously prosecute breaches of the *Second Protective Order* should they occur.

In accordance with the Commission's *Second Protective Order*, an original and one (1) copy of this letter and attachment and two (2) redacted copies of this letter are enclosed. Two confidential copies of this letter have been sent via U.S. Mail to Mr. Eliot Greenwald, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 3-B431, Washington, D.C. 20554.

Pursuant to the Commission Disability Rights Office's May 7, 2012 guidance for submission of reports required by the telecommunications relay service rules, a confidential version, and separate public version are being submitted electronically to TRSreports@fcc.gov. A public inspection copy has been filed with in the Commission's electronic comment filing system.

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Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

ASL SERVICES HOLDINGS, LLC dba GlobalVRS



Angela Roth
President and Chief Financial Officer

Attachment

cc: TRSreports@fcc.gov
Eliot Greenwald (via electronic delivery)
Karen Peltz Strauss (via electronic delivery)
Robert Aldrich (via electronic delivery)
Michael Scott (via electronic delivery)

HIGHLY CONFIDENTIAL INFORMATION - SUBJECT TO SECOND PROTECTIVE ORDER IN CG
DOCKET NOS. 03-123 AND 10-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

FEB 21 2017
FCC Mailroom

STATE OF FLORIDA)
) ss.
COUNTY OF OSCEOLA)

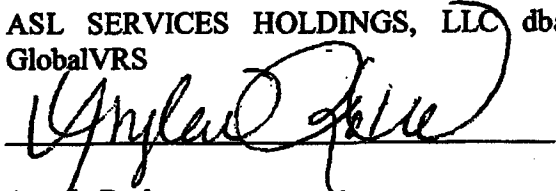
CERTIFICATION

I, Angela Roth, do hereby swear under penalty of perjury that I am President and Chief Executive Officer of ASL Services Holdings, LLC dba GlobalVRS, and further, that I have personally examined the attached confidential financial statements, and as to all statements of fact, as well as to all documentation contained in the confidential financial statements, I believe them to be true, accurate, and complete.

Submitted this 17th day of February, 2017,

ASL SERVICES HOLDINGS, LLC dba
GlobalVRS

By: _____


Angela Roth
President and Chief Executive Officer
38700 Commerce Boulevard
Suite 216
Kissimmee, FL 34741
Telephone: 405.518.7900

ASL Services Holdings, LLC
Profit & Loss
January through December 2016

1:45 PM

02/17/2017

Accrual Basis

Jan - Dec 16

REDACTED

Ordinary Income/Expense

Income

RLSA-VRS Income

Adjustments by RL

Total Income

Gross Profit

Expense

Annual Recurring Fixed

Rent

AIC Rent

Condo Rent

KIC Rent

LBIC Rent

MIC Rent

RPIC Rent

SIC Rent

Total Rent

Utilities

AIC Gas & Electric

Condo Gas & Electric

HIC Gas & Electric

KIC Gas & Electric

MIC Gas & Electric

RPIC Gas & Electric

AIC Internet

Condo Internet

HIC Internet

KIC Internet

LBIC Internet

MIC Internet

RPIC Internet

SIC Internet

KIC Phones

PR Phones

AIC Security

Condo Security/Gate Payment

KIC Security

MIC Security

RPIC Security

KIC Shredding Costs

AIC Water

Jan - Dec 16

Condo Water	
KIC Water	
LBIC Water	
MIC Water	
RPIC Water	
HIC Extermination Services	
Total Utilities	
Building Maintenance	
AIC Janitorial	
Condo Janitorial	
KIC Janitorial	
MIC Janitorial	
RPIC Janitorial	
Building Maintenance - Other	
Total Building Maintenance	
Office Equipment	
AIC Copiers	
KIC Copiers	
LBIC Copiers	
MIC Copiers	
RPIC Copiers	
SIC Copiers	
Total Office Equipment	
Total Annual Recurring Fixed	
Annual Recurring Variable	
Salaries and Benefits - Non-Man	
Salaries and Benefits - Man Emp	
Salaries and Benefits - RCS	
English Interpreters	
Spanish & Trilingual Terps	
Salaries and Benefits - RCS - Other	
Total Salaries and Benefits - RCS	
Telecommunications Expenses	
ACD/Platform PSTN Lines	
Telecommunications Expenses - Other	
Total Telecommunications Expenses	
Relay Center Expenses	
SIC Expenses	
Star Wars party	
Total SIC Expenses	
AIC Supplies & Expenses	
KIC Supplies & Expenses	
Small Tools	
KIC Supplies & Expenses - Other	
Total KIC Supplies & Expenses	

	<u>Jan - Dec 16</u>
LBIC Supplies & Expenses	
Star Wars party	
Total LBIC Supplies & Expenses	
MIC Supplies & Expenses	
RPIC Supplies & Expenses	
Relay Center Expenses - Other	
Total Relay Center Expenses	
Total Annual Recurring Variable	
Annual Admin Expenses	
Finance/Accounting	
Accounting & Corporate Tax Retu	
Bank Fees	
Interest Expense on Equipment L	
Finance/Accounting - Other	
Total Finance/Accounting	
Legal/Regulatory	
FCC Compliance	
SIP Interoperability Conf./FCC	
Total FCC Compliance	
URD Expenses	
Legal/Regulatory - Other	
Total Legal/Regulatory	
Operations Support	
Deaf Blind Expenses	
Customer Support/Freshdesk & QB	
IT Support Services	
Operations Support - Other	
Total Operations Support	
Human Resources	
Billing	
Contract Management	
Risk Management	
Other Corporate Overheads	
Membership Fees/Licenses	
Postage & Delivery Expenses	
Meals & Entertainment	
Meals & Entertainment - Other	
Total Meals & Entertainment	
Travel & Lodging Expenses	
Professional Development	
Web Site Maintenance	
Other Corporate Overhead	
Total Other Corporate Overheads	
Annual Admin Expenses - Other	
Total Annual Admin Expenses	

	<u>Jan - Dec 16</u>
Depreciation & Amortization	
Software	
Total Depreciation & Amortization	
E911/TN Numbering	
E911	
Finance Charge	
Total E911/TN Numbering	
Indirect Overhead Cost	
CSD Lawsuit	
Total Indirect Overhead Cost	
Other TRS Expenses	
Marketing Salary Expenses	
Marketing/Advert. & Outreach	
NDBO 2016 Event	
Facebook.com	
Google.com	
Marketing Events	
Promotional Items	
Marketing Events - Other	
Total Marketing Events	
Marketing/Advert. & Outreach - Other	
Total Marketing/Advert. & Outreach	
Outreach Expenses	
Deaf Nation Expo	
Outreach Expenses - Other	
Total Outreach Expenses	
Total Other TRS Expenses	
Total Expense	
Net Ordinary Income	
Net Income	